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State Bar No. 031691

Attorneys for Defendants City of Tucson, Nicolo Solarino, Francisco Santa Maria, Marco Durazo, Sean Yeandle, Henry Gamez, Donovan Vance, Ryan Ake, Joseph Gradias, Eric Evans, Scott Ellis, Raymond Fleck, Silas Spencer, Keith Goldstein (hereafter "City Defendants")

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA

Irene Briseno, on her own behalf and as the
personal representative of the estate of
Damian Eryko Alvarado,

Plaintiff,

vs.

City of Tucson; Nicolo Solarino (Tucson
Police); Francisco Santa Maria (Tucson
Police); Marco Durazo (Tucson Police); Sean
Yeandle (Tucson Police); Henry Gamez
(Tucson Police); Donovan Vance (Tucson
Police); R. Ake (Tucson Police); Joseph
Gradias (Tucson Police); Eric Evans (Tucson
Police); Scott Ellis (Tucson Police);
Raymond Flex (Tucson Fire); Silas Spencer
(Tucson Fire); Keith Goldstein (Tucson
Fire); and Justin Canovali (private citizen),
all in their individual capacities,

Defendants.

No. 4:22-cv-00132

NOTICE OF DISCOVERY DISPUTE

(Assigned to Hon. Raner C. Collins)

City Defendants, by and through undersigned counsel, pursuant to the Court's
Order (Doc. 64) dated April 14, 2023, hereby submit their Notice of Discovery Dispute.

On September 7, 2023, City Defendants emailed their First Set of Interrogatories
and Requests for Production to Plaintiff via her counsel.

1 On October 12, 2023, Plaintiff's counsel inquired via email about medical releases
2 received in the mail. On the same day, the undersigned counsel's office responded and
3 indicated the releases corresponded with the discovery requests emailed on September 7.
4 Plaintiff's counsel responded that answers to written discovery along with the medical
5 releases would be forthcoming in approximately one week.

6 Plaintiff's counsel did not respond to follow-up emails sent October 23 and 27,
7 2023.

8 A certified letter was mailed on November 7, 2023, signed for on November 10,
9 2023. To date, no responses have been received, nor has Plaintiff's counsel responded in
10 any way.

11
12 DATED: November 20, 2023.

13 MICHAEL G. RANKIN
14 City Attorney

15 By /s/ Renee J. Waters
16 Renee J. Waters
17 Principal Assistant City Attorney

18 **CERTIFICATE OF SERVICE**

19 I hereby certify that on November 20, 2023, I electronically transmitted the attached
20 document to the Clerk's Office using the CM/ECF System for filing and transmittal of a
21 Notice of Electronic Filing to the following CM/ECF registrants:

22 Paul Gattone
23 Law Office of Paul Gattone
24 301 South Convent
25 Tucson, Arizona 85701
gattonecivilrightslaw@gmail.com
Attorney for Plaintiff

26 By /s/ E. Acosta/rdv
27
28